

OCT 5 2021 VCC

Nathan Ochsner, Clerk
Laredo Division

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

LAREDO DIVISION

UNITED STATES OF AMERICA

vs.

RODOLFO REYNA-ZAPATA,
JUAN ANTONIO MARTINEZ-PADILLA,
A.K.A. JUAN ANTONIO
MARTINEZ-LOPEZ,
A.K.A. OTONIEL MARTINEZ-
PADILLA
GREGORIO GONZALEZ-BARRAGAN,
[REDACTED]

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CRIMINAL NO. _____

L-21-1700

MGM

INDICTMENT

THE GRAND JURY CHARGES THAT:

Introduction

At various times relevant to the Indictment,

1. the "Cartel Del Noreste", a.k.a. "CDN" is a drug-trafficking and money-laundering organization which imports and distributes controlled substances, including cocaine, from Mexico into the United States.
2. the "Cartel Del Noreste", a.k.a. "CDN" and its members engage in kidnapping, torture, and murder, as well as drug-trafficking and money laundering, to further the goals of the organization.
3. [REDACTED] is a leader and manager within the "Cartel Del Noreste", a.k.a. "CDN".
4. **RODOLFO REYNA-ZAPATA, JUAN ANTONIO MARTINEZ-PADILLA, A.K.A. JUAN ANTONIO MARTINEZ-LOPEZ, A.K.A. OTONIEL MARTINEZ-PADILLA** and

GREGORIO GONZALEZ-BARRAGAN are soldiers and hitmen within the “Cartel Del Noreste”, a.k.a. “CDN”.

5. the “Cartel Del Noreste”, a.k.a. “CDN” is in control of the United States-Mexico border in and around Laredo, Texas, i.e., the “Nuevo Laredo Plaza”.

Manner and Means

It was part of the conspiracy that the defendants and other members of the “Cartel Del Noreste”, a.k.a. “CDN”, would import controlled substances, including cocaine, into the United States from Mexico.

It was further part of the conspiracy that the defendants and other members of the “Cartel Del Noreste”, a.k.a. “CDN”, would travel in interstate and foreign commerce to effect the goals of the organization.

It was further part of the conspiracy that the defendants and other members of the “Cartel Del Noreste”, a.k.a. “CDN”, would extort and collect fees for permission to transport controlled substances through their territory, the “Nuevo Laredo Plaza”.

It was further part of the conspiracy that the defendants and other members of the “Cartel Del Noreste”, a.k.a. “CDN”, would recruit and hire “sicarios” (hitmen) to protect its territory and controlled substances from rival drug traffickers.

It was further part of the conspiracy that the defendants and other members of the “Cartel Del Noreste”, a.k.a. “CDN”, would kidnap, torture, extort, and murder rivals and victims of the organization.

It was further part of the conspiracy that the defendants and other members of the “Cartel Del Noreste”, a.k.a. “CDN”, would obtain and use firearms to effect the goals of the organization.

COUNT ONE
(The Drug Conspiracy)

Beginning at least on or about September 7, 2021, and continuing at least to on or about September 13, 2021, in the Southern District of Texas, and elsewhere, and within the jurisdiction of the Court, Defendants,

[REDACTED]
**RODOLFO REYNA-ZAPATA,
JUAN ANTONIO MARTINEZ-PADILLA,
A.K.A. JUAN ANTONIO MARTINEZ-LOPEZ,
A.K.A. OTONIEL MARTINEZ-PADILLA.
and GREGORIO GONZALEZ-BARRAGAN,**

did knowingly conspire and agree with each other, and with other persons known and unknown to the Grand Jurors, to possess with intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance.

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects thereof, one or more of the defendants and conspirators, both indicted and unindicted, committed, among others, the following overt acts in the Southern District of Texas and elsewhere:

1. On or about September 7, 2021, **RODOLFO REYNA-ZAPATA, JUAN ANTONIO MARTINEZ-PADILLA, A.K.A. JUAN ANTONIO MARTINEZ-LOPEZ, A.K.A. OTONIEL MARTINEZ-PADILLA, GREGORIO GONZALEZ-BARRAGAN,**

[REDACTED] and others known and unknown to the Grand Jurors, traveled from Nuevo Laredo, Tamaulipas, Mexico into Laredo, Texas.

2. On or about September 7, 2021, [REDACTED]

[REDACTED] met with and solicited **RODOLFO REYNA-ZAPATA, JUAN ANTONIO**

MARTINEZ-PADILLA, A.K.A. JUAN ANTONIO MARTINEZ-LOPEZ, A.K.A. OTONIEL MARTINEZ-PADILLA and GREGORIO GONZALEZ-BARRAGAN to kidnap and murder G.G.T.

3. On or about September 7, 2021, RODOLFO REYNA-ZAPATA, JUAN ANTONIO MARTINEZ-PADILLA, A.K.A. JUAN ANTONIO MARTINEZ-LOPEZ, A.K.A. OTONIEL MARTINEZ-PADILLA, GREGORIO GONZALEZ-BARRAGAN, [REDACTED] drove by the home of G.G.T. in Laredo, Texas.

4. On or about September 7, 2021, [REDACTED] arranged to provide firearms for RODOLFO REYNA-ZAPATA, JUAN ANTONIO MARTINEZ-PADILLA, A.K.A. JUAN ANTONIO MARTINEZ-LOPEZ, A.K.A. OTONIEL MARTINEZ-PADILLA and GREGORIO GONZALEZ-BARRAGAN in Laredo, Texas.

5. Between on or about September 7, 2021 and on or about September 13, 2021, [REDACTED] RODOLFO REYNA-ZAPATA, JUAN ANTONIO MARTINEZ-PADILLA, A.K.A. JUAN ANTONIO MARTINEZ-LOPEZ, A.K.A. OTONIEL MARTINEZ-PADILLA and GREGORIO GONZALEZ-BARRAGAN used a cellular telephone to recruit, plan, and coordinate the kidnapping and murder of G.G.T.

5. Between on or about September 7, 2021 and on or about September 13, 2021, [REDACTED] RODOLFO REYNA-ZAPATA, JUAN ANTONIO MARTINEZ-PADILLA, A.K.A. JUAN ANTONIO MARTINEZ-LOPEZ, A.K.A. OTONIEL MARTINEZ-PADILLA and GREGORIO GONZALEZ-BARRAGAN


used a cellular telephone to plan and coordinate the recovery of controlled substances and drug proceeds from G.G.T.

All in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT TWO

(Murder for Hire Conspiracy)

Between on or about September 7, 2021, and on or about September 13, 2021, in the Southern District of Texas, and elsewhere, and within the jurisdiction of the Court, Defendants,


**RODOLFO REYNA-ZAPATA,
JUAN ANTONIO MARTINEZ-PADILLA,
A.K.A. JUAN ANTONIO MARTINEZ-LOPEZ,
A.K.A. OTONIEL MARTINEZ-PADILLA,
and GREGORIO GONZALEZ-BARRAGAN,**

did knowingly conspire and agree with each other, and with other persons known and unknown to the Grand Jurors, to:

- a) travel in and cause another to travel in interstate and foreign commerce, from the United Mexican States to the United States of America; and
- b) use and cause another to use facilities of interstate and foreign commerce, including but not limited to, automobiles, firearms, and cellular telephones,

with the intent that the murder of G.G.T. be committed in violation of the laws of the State of Texas and of the United States, as consideration for the receipt of, and as consideration for a promise and agreement to pay, things of pecuniary value, to wit: cocaine and proceeds from the sale of cocaine,

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects thereof, one or more of the defendants and conspirators, both indicted and unindicted, committed, among others, the following overt acts in the Southern District of Texas and elsewhere:

1. On or about September 7, 2021, [REDACTED] [REDACTED] contacted a confidential source by cellular telephone.
2. On or about September 7, 2021, [REDACTED] [REDACTED] traveled from Nuevo Laredo, Tamaulipas, Mexico to Laredo, Texas.
3. On or about September 7, 2021, [REDACTED] [REDACTED] provided **RODOLFO REYNA-ZAPATA, GREGORIO GONZALEZ-BARRAGAN**, and a confidential source with cellular telephones.
4. On or about September 7, 2021, [REDACTED] [REDACTED] provided a confidential source an address where the confidential source could pick up firearms for **RODOLFO REYNA-ZAPATA, GREGORIO GONZALEZ-BARRAGAN**, and **JUAN ANTONIO MARTINEZ-PADILLA, A.K.A. JUAN ANTONIO MARTINEZ-LOPEZ, A.K.A. OTONIEL MARTINEZ-PADAILLA**.
5. On or about September 7, 2021, [REDACTED] [REDACTED] offered a confidential source payment in the form of cocaine, drug proceeds, and the forgiveness of a debt to the "Cartel Del Noreste", a.k.a. "CDN" for assisting with the murder of G.G.T. for stealing cocaine from the "Cartel Del Noreste", a.k.a. "CDN".
6. On or about September 12, 2021, [REDACTED] [REDACTED] instructed a confidential source over a cellular telephone to murder G.G.T. and return any cocaine and drug proceeds recovered during the execution of the plot to [REDACTED]

[REDACTED]

7. On or about September 12, 2021, a confidential source and **RODOLFO REYNA-ZAPATA** spoke over a cellular telephone to discuss the murder of G.G.T.

8. On or about September 13, 2021, a confidential source, **RODOLFO REYNA-ZAPATA**, and **JUAN ANTONIO MARTINEZ-PADILLA**, A.K.A. **JUAN ANTONIO MARTINEZ-LOPEZ**, A.K.A. **OTONIEL MARTINEZ-PADILLA** spoke over a cellular telephone to discuss the murder of G.G.T.

9. On or about September 13, 2021, [REDACTED]
[REDACTED] caused a confidential source to supply an automobile and firearms to **RODOLFO REYNA-ZAPATA**, **JUAN ANTONIO MARTINEZ-PADILLA**, A.K.A. **JUAN ANTONIO MARTINEZ-LOPEZ**, A.K.A. **OTONIEL MARTINEZ-PADILLA** and **GREGORIO GONZALEZ-BARRAGAN**.

10. On or about September 13, 2021, **RODOLFO REYNA-ZAPATA**, **JUAN ANTONIO MARTINEZ-PADILLA**, A.K.A. **JUAN ANTONIO MARTINEZ-LOPEZ**, A.K.A. **OTONIEL MARTINEZ-PADILLA** and **GREGORIO GONZALEZ-BARRAGAN** took possession of an automobile and firearms to carry out the murder of G.G.T.

All in violation of Title 18, United States Code, Section 1958(a).

COUNT THREE
(Murder for Hire)

Between on or about September 7, 2021, and on or about September 13, 2021, in the Southern District of Texas, and elsewhere, and within the jurisdiction of the Court, Defendants,

[REDACTED]
RODOLFO REYNA-ZAPATA,
JUAN ANTONIO MARTINEZ-PADILLA,
A.K.A. JUAN ANTONIO MARTINEZ-LOPEZ,

**A.K.A. OTONIEL MARTINEZ-PADILLA.
and GREGORIO GONZALEZ-BARRAGAN,**

did knowingly:


- a) travel in and cause another to travel in interstate and foreign commerce, from the United Mexican States to the United States of America; and
- b) use and cause another to use facilities of interstate and foreign commerce, including but not limited to, automobiles, firearms, and cellular telephones,

with the intent that the murder of G.G.T. be committed in violation of the laws of the State of Texas and of the United States, as consideration for the receipt of, and as consideration for a promise and agreement to pay, things of pecuniary value, to wit: cocaine and proceeds from the sale of cocaine,

In violation of Title 18, United States Code, Section 1958(a) and 2.

COUNT FOUR
(Solicitation to Murder G.G.T.)

On or about September 7, 2021, in the Southern District of Texas, and elsewhere, and within the jurisdiction of the Court, Defendant,



with the intent that **RODOLFO REYNA-ZAPATA, JUAN ANTONIO MARTINEZ-PADILLA, A.K.A. JUAN ANTONIO MARTINEZ-LOPEZ, A.K.A. OTONIEL MARTINEZ-PADILLA** and **GREGORIO GONZALEZ-BARRAGAN**, and others known and unknown to the Grand Jurors, engage in conduct constituting a felony that has as an element the use, attempted use, and threatened use of physical force against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, did solicit, command, induce, and endeavor to persuade **RODOLFO REYNA-ZAPATA,**

JUAN ANTONIO MARTINEZ-PADILLA, A.K.A. JUAN ANTONIO MARTINEZ-LOPEZ, A.K.A. OTONIEL MARTINEZ-PADAILLA and GREGORIO GONZALEZ-BARRAGAN, and others known and unknown to the Grand Jurors to engage in such conduct, that is, to attempt and conspire to murder G.G.T. in violation of Title 18, United States Code Sections 1958(a).

In violation of Title 18, United States Code, Section 373 and 2.

COUNT FIVE
(Conspiracy to Kidnap G.G.T.)

Beginning at least on or about September 7, 2021 and continuing to on or about September 13, 2021, in the Southern District of Texas; and elsewhere, and within the jurisdiction of the Court, Defendants,


**RODOLFO REYNA-ZAPATA,
JUAN ANTONIO MARTINEZ-PADILLA,
A.K.A. JUAN ANTONIO MARTINEZ-LOPEZ,
A.K.A. OTONIEL MARTINEZ-PADAILLA.
and GREGORIO GONZALEZ-BARRAGAN,**

did knowingly and unlawfully conspire and agree together and with each other, and with other persons known and unknown to the Grand Jury, to kidnap, abduct, seize, confine, and carry away, G.G.T., and willfully transport the victim in interstate and foreign commerce from the United States to Mexico, and hold him for reward and otherwise.

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects thereof, one or more of the defendants and co-conspirators, committed, among others, the following overt acts in the Southern District of Texas and elsewhere:

1. On or about September 7, 2021, in Nuevo Laredo, Tamaulipas, Mexico, defendant,

[REDACTED] ordered the kidnapping of G.G.T. in Laredo, Texas.

2. On or about September 7, 2021, [REDACTED] **RODOLFO REYNA-ZAPATA, JUAN ANTONIO MARTINEZ-PADILLA, A.K.A. JUAN ANTONIO MARTINEZ-LOPEZ, A.K.A. OTONIEL MARTINEZ-PADILLA** and **GREGORIO GONZALEZ-BARRAGAN** traveled to Laredo, Texas.

3. On or about September 7, 2021, [REDACTED] **RODOLFO REYNA-ZAPATA, GREGORIO GONZALEZ-BARRAGAN** and a confidential source met in Laredo, Texas to discuss the kidnapping of G.G.T.

4. On or about September 12, 2021, a confidential source and **RODOLFO REYNA-ZAPATA** spoke over a cellular telephone to discuss the kidnapping of G.G.T.

5. On or about September 13, 2021, a confidential source, **RODOLFO REYNA-ZAPATA**, and **JUAN ANTONIO MARTINEZ-PADILLA, A.K.A. JUAN ANTONIO MARTINEZ-LOPEZ, A.K.A. OTONIEL MARTINEZ-PADILLA** spoke over a cellular telephone to discuss the kidnapping of G.G.T.

6. On or about September 13, 2021, [REDACTED] caused a confidential source to supply an automobile and firearms to **RODOLFO REYNA-ZAPATA, JUAN ANTONIO MARTINEZ-PADILLA, A.K.A. JUAN ANTONIO MARTINEZ-LOPEZ, A.K.A. OTONIEL MARTINEZ-PADILLA** and **GREGORIO GONZALEZ-BARRAGAN**.

7. On or about September 13, 2021, **RODOLFO REYNA-ZAPATA, JUAN ANTONIO MARTINEZ-PADILLA, A.K.A. JUAN ANTONIO MARTINEZ-LOPEZ, A.K.A. OTONIEL MARTINEZ-PADILLA** and **GREGORIO GONZALEZ-BARRAGAN**

took possession of an automobile and firearms to carry out the kidnapping of G.G.T.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 1201(c).

COUNT SIX

(Possession of Firearms in Furtherance of Drug Trafficking Crime or Crime of Violence)

On or about September 13, 2021, in the Southern District of Texas, and within the jurisdiction of the Court, Defendants,

**RODOLFO REYNA-ZAPATA,
JUAN ANTONIO MARTINEZ-PADILLA,
A.K.A. JUAN ANTONIO MARTINEZ-LOPEZ,
A.K.A. OTONIEL MARTINEZ-PADILLA.
and GREGORIO GONZALEZ-BARRAGAN,**

aiding and abetting each other, did knowingly possess at least one firearm, that is,

1) a Colt, Government Model, caliber .45 pistol with serial number ELPAT180;
2) a Trooper, MK III, caliber .357 Magnum revolver;
3) a Bushmaster, Model XM15E2S, caliber .223 – 5.56 mm rifle with serial number L202736; and


4) a Colt AR-15 A2, Model Sporter II, caliber .223, with serial number SP 330220,
in furtherance of:

- 1) a drug trafficking crime which may be prosecuted in a court of the United States, that is, Conspiracy to Possess with Intent to Distribute a Controlled Substance as charged in Count One of the Indictment; and
- 2) of a crime of violence which may be prosecuted in a court of the United States, that is, Murder for Hire as charged in Count Three of the Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1)(A), and 2.

COUNT SEVEN
(ITAR – Attempted Murder of G.G.T.)

Beginning at least on or about September 7, 2021 and continuing to on or about September 13, 2021, in the Southern District of Texas, and elsewhere, and within the jurisdiction of the Court, Defendants,


**RODOLFO REYNA-ZAPATA,
JUAN ANTONIO MARTINEZ-PADILLA,
A.K.A. JUAN ANTONIO MARTINEZ-LOPEZ,
A.K.A. OTONIEL MARTINEZ-PADILLA.
and GREGORIO GONZALEZ-BARRAGAN,**

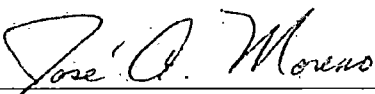
and other conspirators, known and unknown to the Grand Jury, aiding and abetting each other, did travel in foreign commerce, that is, to and from the United Mexican States and to and from the United States of America, and use a facility in interstate and foreign commerce, that is, automobiles, firearms, and cellular telephones, with the intent to commit a crime of violence to further an unlawful activity, that is, a business enterprise involving controlled substances in violation to Title 21, United States Code, Sections 841(a)(1) and 846, and thereafter knowingly attempted to commit a crime of violence to further such unlawful activity.

In violation of Title 18, United States Code, Sections 1952(a)(2)(B) and 2.

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

JENNIFER B. LOWERY
ACTING UNITED STATES ATTORNEY



José Angel Moreno
Assistant United States Attorney

CRIMINAL DOCKET **L-21-1700**

LAREDO DIVISION

NO. _____

FILE: 21-07185
INDICTMENT

MAG#: 21-02084
Filed: October 5, 2021


Judge: _____

UNITED STATES OF AMERICA

VS.

ATTORNEYS:

JENNIFER B. LOWERY, ACTING USA
JOSÉ ANGEL MORENO, AUSA

RODOLFO REYNA-ZAPATA
JUAN ANTONIO MARTINEZ-PADILLA
AKA: JUAN ANTONIO MARTINEZ-LOPEZ,
OTONIEL MARTINEZ-PADILLA
GREGORIO GONZALEZ-BARRAGAN,


CHARGE:

- Ct. 1: Conspiracy to possess with intent to distribute 5 kilograms or more of cocaine
[21 USC 846, 841(a)(1) & 841(b)(1)(A)]
- Ct. 2: Murder for Hire Conspiracy [18 USC 1958(a)]
- Ct. 3: Murder for Hire [18 USC 1958(a) and 2]
- Ct. 4: Solicitation to Commit Murder
[18 USC 373 and 2]
- Ct. 5: Conspiracy to Kidnap
[18 USC 1201 (a)(1) and (c)]
- Ct. 6: Possession of Firearm in Furtherance of Drug Trafficking Crime or Crime of Violence
[18 USC 924 (c) and 2]
- Ct. 7: Interstate Travel in Aid of Racketeering (Attempted Murder)
[18 USC 1952(a)(2)(B) and 2]

TOTAL COUNTS: 7

PENALTY:

- Ct.1: 10 years to life of imprisonment, not more than a \$10,000,000 fine,
\$100 special assessment, at least 5 years up to a life term of supervised release.
- Cts. 2,3, &7: 20 years imprisonment, not more than \$250,000 fine, \$100 special assessment,
not more than 3 years term of supervised release;
- Ct.4: 10 years imprisonment, not more than \$125,000 fine, \$100 special assessment,
not more than 3 years term of supervised release;
- Ct.5: any term of years up to life imprisonment, not more than \$250,000 fine, \$100
special assessment, not more than 5 years term of supervised release
- Ct.6: 5 years to life imprisonment, not more than \$250,000 fine, \$100 special
assessment not more than 5 years term of supervised release;